



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

September 1, 2023

**BY ECF**

Hon. Jesse M. Furman  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Joshua Adam Schulte*,  
S2 17 Cr. 548 (JMF)**

Dear Judge Furman:

The Government respectfully submits this letter to advise the Court that, in an effort to streamline and expedite the presentation of evidence at trial, the Government does not intend to introduce certain exhibits that were the subject of the parties' motions *in limine*. In particular, and as the Government has separately advised defense counsel, the Government does not intend to introduce the defendant's statements from his prison notebooks (*see* D.E. 1088 at 14-17; D.E. 1092 at 7-10); IRC chats, or Google searches (*see* D.E. 1088 at 23-26; D.E. 1092 at 5-7). In addition, the Government has proposed a stipulation regarding the authenticity of materials seized from the defendant that the Government expects would obviate the need for several witnesses; if the parties are able to agree to the stipulation, the Government expects that the only witnesses it would call in its case-in-chief would be Special Agents Richard Evanchec and Aaron Spivack and Computer Scientist Michael Berger.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by:                     /s/                      
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cc: Defense counsel (by ECF)  
Joshua Adam Schulte (by U.S. Mail)